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November 8, 2023

VIA ECF

The Honorable J. Brendan Day
United States Magistrate Judge
District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Edible IP, LLC et al v. World Media Group, LLC
Case No. 3:20-cv-19178-MAS-JBD

Dear Judge Day:

This firm represents Plaintiffs/Counterclaim Defendants Edible IP, LLC and Edible Arrangements, LLC and Counterclaim Defendants Edible Brands, LLC, Edible Arrangements International, Inc. d/b/a Edible Arrangements International, LLC, and Netsolace, Inc. (collectively, “Edible”) in the above-referenced action. We write jointly with counsel for World Media Group, LLC (“WMG”) to provide a proposed schedule as directed by Your Honor during the status conference held on November 1, 2023. Counsel for WMG reviewed this letter prior to its submission. The parties respectfully request that the current schedule be amended as follows:

I. Fact Discovery

The close of fact discovery to be extended from November 17, 2023 to January 31, 2024.

II. Expert Discovery

The deadline for service of affirmative expert reports to be extended from December 22, 2023 to February 2, 2024; the deadline for service of rebuttal expert reports to be extended from January 31, 2024 to March 1, 2024; and the close of expert discovery to be extended from February 29, 2024 to March 29, 2024.

III. Dispositive Motions

Dispositive motions to be filed by May 10, 2024, and returnable by June 3, 2024.

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We thank the Court for its continued assistance with this matter.

Respectfully submitted,

BAKERHOSTETLER

Attorneys for Plaintiff Edible IP, LLC

By: */s/ Jason S. Oliver*

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Attorney for Edible